

Wood, Smith, Henning & Berman LLP
TIMOTHY J. REPASS, OSB #126069
12755 SW 69th Avenue, Suite 100
Portland, Oregon 97223
Telephone: 971-256-4010
Facsimile: 971-275-1928
trepass@wshblaw.com

Attorneys for Grand Cafe, Inc. dba Aladdin's
Café, Diyana Kassab, and Mutasim Khan

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

FRANCISCO RAMIREZ, and **KARLA**
CAAMAL, individuals,

Plaintiffs,
v.

Case No. 3:18-cv-1480

[PROPOSED] GENERAL
JUDGMENT OF DISMISSAL

GRAND CAFE, INC., an Oregon business
corporation, doing business as **ALADDIN'S CAFE**,
DIYANA KASSAB, individual, and **MUTASIM**
KHAN, individual,

Defendants.

Pursuant to Stipulation of the parties, the litigation entitled Ramirez, et al. v. Grande Café, Inc., et al., Case No. 3:18-cv-1480, is hereby dismissed, with prejudice, and without an award of costs or attorneys' fees to any party. The United States District Court – District of Oregon, Portland Division, shall retain jurisdiction to oversee compliance with the terms of the Settlement Agreement and to any motions to modify such terms. *See, Kokkonen v. Guardian Life Ins. Co. of America* (1994) 511 U.S. 375.

DATED: August ___, 2019

JUDGE OF THE UNITED STATES DISTRICT
COURT - DISTRICT OF OREGON, PORTLAND
DIVISION

Presented by:

WOOD SMITH HENNING & BERMAN, LLP

By /s/ Timothy J. Repass
Timothy J. Repass, OSB No. 126069
trepass@wshblaw.com
Attorneys for Defendants Grand Cafe, Inc.
dba Aladdin's Café, Diyana Kassab, and Mutasim Khan

NORTHWEST WORKERS JUSTICE PROJECT

By: /s/ Corinna Spencer-Scheurich
CORINNA SPENCER-SCHEURICH,
OSB #130147
corinna@nwjp.org
Attorneys for Plaintiffs, Francisco Ramirez
and Karla Caamal